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January 12, 2022

Via ECF

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007
(212) 805-0290

**Re: *Foxmind Canada Enterprises Ltd. v. ABCTEC, et al.* Case 1:21-cv-05146-KPF
Request for Oral Argument on Defendants' Motion to Dismiss [D.E. 65]**

Dear Judge Failla,

The undersigned law firm represents the following Defendants: (1) Acbery, (2) Anzir, (3) Bejiang-Zs, (4) Callenbach, (5) Caotop, (6) Cindbest, (7) Conqload, (8) Dolphin Tech US, (9) Endless-US, (10) Enjoygoodproduct, (11) Guo Xiao Yan, (12) Hollosport, (13) Hongpu-AA, (14) Jarcold, (15) Johnson's Home, (16) Kongjiandianzishangwu, (17) Munash Pro, (18) Newpeppr, (19) Oniisee Store, (20) Priamaa, (21) Run Duck, (22) Sharlovy-US Direct, (23) Songguodong, (24) Sweat2020, (25) Ulove Best, (26) Xibaopeng, (27) Yalaidir, (28) Ycl-US, (29) Yopen, (30) Zhangyaowu, (31) Zhengbaomaoyi, and (32) Zhongsi-US (the "Moving Defendants").¹

Pursuant to Rule 4.E. of Your Honor's Individual Rules of Practice in Civil Cases, the undersigned respectfully requests an oral argument on the Moving Defendants' Motion to Dismiss [D.E. 65]. A courtesy copy of the parties' briefs and declarations in connection with the Motion has been mailed to Your Honor's chambers.

We thank Your Honor for your consideration.

Sincerely,

/s/ Zhen Pan
Zhen Pan

¹ Defendants Rich-Ting and Sunay originally moved to dismiss the complaint. In December of 2021, both Defendants were dismissed from this action with prejudice.